

M. Paul Wright  
State Bar No. IL 6298791  
MP Wright Law Group, PLLC  
P.O. Box 140915  
Dallas, TX 75214  
Tel. (214) 420-6465  
Fax. (469) 327-2902

ATTORNEY FOR DEBTOR(S)

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE  
JESSE JOE ORTIZ, SR.  
108 S. Beverly St.  
Crowley, TX 76036  
SSN: xxx-xx-3010**

**PATRICIA SYLVIA ORTIZ**  
**108 S. Beverly Court**  
**Crowley, TX 76036**  
**SSN: xxx-xx-7119**

**Debtor(s)**

~~~~~

**CASE NO. 16-44056-MXM-13**

## CHAPTER 13

**DEBTOR(S) CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13  
DISCHARGE PURSUANT TO 11 U.S.C. § 1328(a)**

The Debtor(s) move for entry of discharge under 11 U. S. C. § 1328(a) of the Bankruptcy Code.

1. By signing below, the Debtor(s) certify under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

A. I have completed the personal financial management instructional course from an agency approved by the United States Trustee. A copy of Official Form 23 is attached as Exhibit 1.

**B. If I owe a debt arising from (a) any violation of any state or federal securities laws,**

regulations or orders; (b) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (c) a civil remedy under § 1964 of title 18; or (d) a criminal act, intentional tort, or willful or reckless misconduct that caused serious physical injury or death to another individual in the preceding five years, then I have not claimed an exemption for my residence in an amount in excess of \$125,000.

C. All amounts payable by me on a domestic support obligation, that are due through this date (including amounts due before the petition was filed in this case, but only to the extent provided for by the plan) have been paid.


D. I have not received a discharge in a case filed under chapter 7, 11, or 12 of the Bankruptcy Code during the four-year period before the date that my petition was filed in this case.

E. I have not received a discharge in a case filed under chapter 13 of the Bankruptcy Code during the two-year period before the date that my petition was filed in this case.

F. No criminal proceeding is pending against me alleging that I am guilty of a felony.

G. No civil case is pending against me alleging that I am liable for any (a) violation of the Federal securities laws, and State securities law, or any regulation or order issued under Federal securities laws or State securities laws; (b) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (c) civil remedy under § 1964 of title 18; or (d) criminal act, intentional tort, or willful or reckless misconduct that caused serious physical injury or death to another individual in the preceding five years.

2. I have made all payments required by my confirmed chapter 13 plan.

Signed:   
JESSE JOE ORTIZ, SR.

Respectfully Submitted,

/s/ M. Paul Wright  
M. Paul Wright  
State Bar No. IL 6298791

MP Wright Law Group, PLLC  
wework - Victory Plaza  
3090 Olive St, Ste 300  
Dallas, TX 75219  
214.420.6465 Phone  
469.327.2902 Fax

ATTORNEY FOR DEBTOR(S)

**NOTICE**

UNLESS A RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT BEFORE CLOSE OF BUSINESS TWENTY-FOUR (24) DAYS FROM THE DATE OF SERVICE HEREOF, A HEARING MAY NOT BE CONDUCTED.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE TO (1) ANY PERSON TO WHOM A DEBTOR HAS BEEN ORDER TO PAY SUPPORT (EITHER SPOUSAL SUPPORT OR CHILD SUPPORT), (2) THE CHAPTER 13 TRUSTEE, (3) THE UNITED STATES TRUSTEE, AND (4) ALL CREDITORS.

IF NO RESPONSE IS TIMELY FILED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 3, 2021, a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

Respectfully Submitted,

MP Wright Law Group, PLLC

/s/ M. Paul Wright

M. Paul Wright

State Bar No. IL 6298791

**DEBTOR(S):**

Jesse Joe Ortiz, Sr.  
Patricia Sylvia Ortiz  
108 S. Beverly St.  
Crowley, TX 76036

**STANDING CHAPTER 13 TRUSTEE:**

Pam Bassel

7001 Blvd 26, Suite 150  
North Richland Hills, TX 76180

Tim Truman  
6851 N.E. Loop 820, Ste 300  
North Richland Hills, TX 76180

**U.S. TRUSTEE**

Rm. 976  
1100 Commerce Street  
Dallas, TX 75242